Andy Lachance Assistant General Counsel



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May 16, 2014

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: Amendment of Parts 1 and 22 of the Commission's Rules with Regard to the Cellular Service, Including Changes in Licensing of Unserved Areas, WT Docket No. 12-40; RM-11510; Amendment of the Commission's Rules Governing Power Limits in the Cellular Radio Service Frequency Bands; RM-11660, DA 12-701.

Dear Ms. Dortch:

On May 14, 2014, Scott Townley, Max Solondz, Leora Hochstein and Andy Lachance of Verizon had a teleconference with Roger Noel and Tom Derenge of the FCC's Wireless Bureau, Mobility Division. We discussed AT&T's Petition seeking to amend Section 22.913 of the Commission's rules¹ to adopt power spectral density ("PSD") limits (stated as Watts/MHz) to facilitate deploying broadband technologies such as LTE in the cellular bands.² In reply comments addressing the AT&T Petition, Verizon supported amending the cellular rules to adopt PSD limits, but proposed that the Commission adopt higher PSD limits equivalent to those adopted for use in the 700 MHz Upper C Band.³ Verizon also proposed that the Commission adopt power flux density limits equivalent to those adopted for use in the 700 MHz Upper C Band⁴ to mitigate the potential for interference to adjacent licensees.⁵ During the conversation, Verizon discussed the

² Amendment of the Commission's Rules Governing Power Limits in the Cellular Radio Service Frequency Bands; Petition for Expedited Rulemaking and Request for Waiver, RM-11660, DA 12-701, filed February 28, 2012 ("AT&T Petition").

^{1 47} C.F.R. § 22.913.

³ See 47 C.F.R. § 27.950(b)(4)-(5).

⁴ See 47 C.F.R. § 27.955(c).

⁵ Reply Comments of Verizon Wireless, RM-11660, filed June 18, 2012, at 4-11.

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coverage benefits of adopting the higher PSD limits it proposed and its experience using the higher PSD limits in the 700 MHz band.

This letter is being filed pursuant to Section 1.1206 of the Commission's Rules. Should you have any questions, please contact the undersigned.

Sincerely,

Andre J. Lachance

(via e-mail) cc:

> Roger Noel Tom Derenge